

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MIKE SHALES, et al.,)
)
Plaintiffs,) CIVIL ACTION
)
v.) NO. 15 C 1882
)
TABITHA VENTURES, INC.,) JUDGE MANISH S. SHAH
an Illinois corporation,)
)
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, TABITHA VENTURES, INC., an Illinois corporation, in the total amount of \$60,317.95, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,699.25.

On March 10, 2015, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on March 31, 2015. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 14th day of April 2015:

Mr. James M. Tomlin, Registered Agent
Tabitha Ventures, Inc.
1314 E. Marietta Avenue
Peoria Heights, IL 61616

Mr. Edward Taiwo, President
Tabitha Ventures, Inc.
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/s/ Cecilia M. Scanlon

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